

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

Committee of Pitkiners: Clay Chastan,  
William Young, Mary Eaton, Pamela  
Doherty, Lita Matthews

(Write the full name of each plaintiff who is filing  
this complaint. If the names of all the plaintiffs  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

-against-

City of Kansas City, MO

(Write the full name of each defendant who is  
being sued. If the names of all the defendants  
cannot fit in the space above, please write "see  
attached" in the space and attach an additional  
page with the full list of names.)

Complaint for a Civil Case

Case No. 20-CV-694-RK  
(to be filled in by the Clerk's Office)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. ☒ Yes ☐ No

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Clay Chastain *★-Leading member of Committee*  
Street Address 421 Lee St.  
City and County Bedford, Va. Bedford County  
State and Zip Code Virginia 24523  
Telephone Number 540-521-3012  
E-mail Address Claychastain007@gmail.com

**B. The Defendant(s)** *★ See Attached Sheet.*

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name City of Kansas City, MO.  
Job or Title (if known) (City Hall)  
Street Address 414 E. 12th St.  
City and County Kansas City, Jackson  
State and Zip Code Missouri 64106  
Telephone Number 816-513-5000  
E-mail Address (if known) \_\_\_\_\_

**Defendant No. 2**

Name \_\_\_\_\_  
Job or Title (if known) \_\_\_\_\_  
Street Address \_\_\_\_\_  
City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address  
(if known) \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the designated information for this type of case. *(Check all that apply)*

☒ Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

1st Amendment to the Constitution - Right  
to Petition for Redress of Grievances.

☐ Suit against the Federal Government, a federal official, or a federal agency

List the federal officials or federal agencies involved, if any.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☐ Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

A. The Plaintiff(s)

The plaintiff, *(name)* \_\_\_\_\_, is a citizen of the State  
of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) \_\_\_\_\_, is a citizen of the State of (name) \_\_\_\_\_. Or is a citizen of (foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

C. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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III. Statement of Claim

Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? *Members of Committee whose union petition was not placed on ballot by Defendant as Reg'd by LAW.*
- What injuries did you suffer? *Violation of 1st Amendment Civil right of petition*
- Who was involved in what happened to you?

*The City of Kansas City, Mo. (City Hall)*

- How were the defendants involved in what happened to you?

*They refused to place valid petition from Committee on 5/1/18*

- Where did the events you have described take place?

*Kansas City, Mo.*

- When did the events you have described take place?

*April 2019 through July 25 2020*

If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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#### IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

*Punitive and compensatory damages totaling*

*\$ 5,000,000.00*

Do you claim the wrongs alleged in your complaint are continuing to occur at the present time?

Yes ☒

No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☒

No ☐

Do you claim punitive monetary damages?

Yes ☒

No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

\$ 5,000,000.00 For City's failure to place  
Committee's value position on the ballot.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/14, 2020

Signature of Plaintiff

Printed Name of Plaintiff

C. Clay Chastain  
C. Clay Chastain



- William Young: 3441 Wyoming St.

RCMO 6411. Ph.# 816-799-3888  
999-3838

- Deretta Dickerson: 3454 Wyoming St

RCMO 6411. Ph.# - Unknown

- Lato Mathews: 3454 Wyoming St.

RCMO 6411 Ph.# - Unknown

- Mary E. Low: 3473 Wyoming St

RCMO - Ph.#. 816-433-1219

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